

EXHIBIT B

Melvin Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING, LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION OF CHARLES MELVIN IN
SUPPORT OF MOTION OF WINCENT INVESTMENT
FUND PCC LIMITED FOR ENTRY OF AN ORDER ALLOWING
AN ADMINISTRATIVE EXPENSE CLAIM AND GRANTING RELATED RELIEF**

I, Charles Melvin, declare as follows:

1. I am a Director and the Chief Legal Officer of Wincent Capital Management Limited (“WCM”), which is the Investment Director of Wincent Investment Fund PCC Limited (“Wincent”). In my capacity as a Director and Chief Legal Officer of WCM, I am familiar with its operations, day-to-day business affairs, books and records, and trades placed on the Debtors’ Exchange by Wincent.

2. I am duly authorized to make and submit this declaration in support of the *Motion of Wincent Investment Fund PCC Limited for Entry of an Order Allowing an Administrative Expense Claim and Granting Related Relief* (the “Motion”)² filed contemporaneously herewith.

3. Except as otherwise indicated, all facts set forth in this declaration are based on my personal knowledge, my communications with other members of Wincent’s and WCM’s

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the Debtors’ claims and noticing agent’s website at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

management, employees and professionals, my review of relevant documents, or my opinion, based on my overall professional experience with Wincent's trading and business affairs.

4. As of the Petition Filing, Wincent's accounts on the Exchange totaled \$30,838,648.57. As of the Shutdown, Wincent's accounts on the Exchange totaled \$33,701,993.35. In other words, Wincent had a Postpetition Profit of \$2,863,284.78.

5. Attached as **Exhibit C** to the Motion is a true and correct copy of the balance Wincent believes were in its accounts as of the Petition Filing and at the time of the Shutdown which demonstrates, *inter alia*, Wincent's Postpetition Profit.

6. I am informed that claims resulting from transactions with a debtor after the filing of such debtor's chapter 11 petition that benefit the debtor's estates, and are in the ordinary course of a debtor's business are afforded administrative priority status under section 503(b) of the Bankruptcy Code.

7. Accordingly, I believe Wincent should receive an administrative priority claim in the amount of \$2,863,284.78 for its successful postpetition trading activity on the Exchange.

8. To date, Wincent has not received payment for the Postpetition Profit.

[Remainder of page intentionally left blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed this 3rd day of February 2025

/s/ Charles Melvin

Charles Melvin
Director, Chief Legal Officer
Wincent Capital Management Limited
for and on behalf of:
Wincent Investment Fund PCC Limited